

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN
FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF
DEBTORS' ONE HUNDRED FIFTY-SEVENTH OMNIBUS OBJECTION
TO CLAIMS SHOULD REVIEW THE OMNIBUS OBJECTION TO SEE IF
THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS
OBJECTION AND/OR IN THE EXHIBIT ATTACHED THERETO TO
DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR
CLAIM(S).**

**IF YOU HAVE QUESTIONS, PLEASE CONTACT
DEBTORS' COUNSEL, ERIN ECKOLS, AT 214-746-7700.**

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Robert J. Lemons

Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**NOTICE OF HEARING ON DEBTORS' ONE HUNDRED FIFTY-SEVENTH
OMNIBUS OBJECTION TO CLAIMS (AMENDED AND SUPERSEDED CLAIMS)**

PLEASE TAKE NOTICE that on July 11, 2011, Lehman Brothers Holdings Inc.
and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in
possession (collectively, the "Debtors"), filed their one hundred fifty-seventh omnibus objection
to claims (the "Debtors' One Hundred Fifty-Seventh Omnibus Objection to Claims"), and that a

hearing (the “Hearing”) to consider the Debtors’ One Hundred Fifty-Seventh Omnibus Objection to Claims will be held before the Honorable James M. Peck, United States Bankruptcy Judge, in Courtroom 601 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **August 25, 2011 at 10:00 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses to the Debtors’ One Hundred Fifty-Seventh Omnibus Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242, and on (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) attorneys for the Debtors, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Robert J. Lemons, Esq. and Mark Bernstein, Esq.); (iii) the Office of the United States Trustee for Region 2, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq., Elisabetta Gasparini, Esq., and Andrea B. Schwartz, Esq.); and (iv) attorneys for the official committee of unsecured creditors appointed in these cases, Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005 (Attn: Dennis F. Dunne, Esq., Dennis O’Donnell, Esq., and

Evan Fleck, Esq.); so as to be so filed and received by no later than **August 10, 2011 at 4:00 p.m. (Eastern Time)** (the “Response Deadline”).

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the Debtors’ One Hundred Fifty-Seventh Omnibus Objection to Claims or any claim set forth thereon, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Debtors’ One Hundred Fifty-Seventh Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: July 11, 2011
New York, New York

/s/ Robert J. Lemons

Robert J. Lemons

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Attorneys for Debtors and
Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : Chapter 11 Case No.
:
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : 08-13555 (JMP)
:
Debtors. : (Jointly Administered)
-----X

**DEBTORS' ONE HUNDRED FIFTY-SEVENTH OMNIBUS
OBJECTION TO CLAIMS (AMENDED AND SUPERSEDED CLAIMS)**

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE
CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING
THIS ONE HUNDRED FIFTY-SEVENTH OMNIBUS OBJECTION
TO CLAIMS SHOULD REVIEW THE OMNIBUS OBJECTION TO
SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN
THE OMNIBUS OBJECTION AND/OR IN THE EXHIBIT
ATTACHED THERETO TO DETERMINE WHETHER THIS
OBJECTION AFFECTS THEIR CLAIM(S).**

**IF YOU HAVE QUESTIONS, PLEASE CONTACT
DEBTORS' COUNSEL, ERIN ECKOLS, AT 214-746-7700.**

TO THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE:

Lehman Brothers Holdings Inc. (“LBHI”) and its affiliated debtors, in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the “Debtors”), respectfully represent:

Relief Requested

1. The Debtors file this one hundred fifty-seventh omnibus objection to claims (the “One Hundred Fifty-Seventh Omnibus Objection to Claims”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the “Procedures Order”) [Docket No. 6664], seeking the disallowance and expungement of the claims listed on Exhibit A annexed hereto.

2. The Debtors have examined the proofs of claim identified on Exhibit A and have determined that the proofs of claim listed under the heading “*Claims to be Disallowed and Expunged*” (collectively, the “Amended and Superseded Claims”) have been amended and superseded by at least one subsequently filed, corresponding claim identified under the heading “*Surviving Claims*” (collectively, the “Surviving Claims”). The Debtors seek the disallowance and expungement from the Court’s claims register of the Amended and Superseded Claims and preservation of the Debtors’ right to later object to any Surviving Claim on any basis.

3. This One Hundred Fifty-Seventh Omnibus Objection to Claims does not affect any of the Surviving Claims and does not constitute any admission or finding with respect to any of the Surviving Claims. Further, the Debtors reserve all their rights to object on any basis to any Amended and Superseded Claim as to which the Court does not grant the relief requested herein.

Jurisdiction

4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

Background

5. Commencing on September 15, 2008, and periodically thereafter, LBHI and certain of its subsidiaries commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code. The Debtors' chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Bankruptcy Rule 1015(b). The Debtors are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. On September 17, 2008, the United States Trustee for Region 2 (the "U.S. Trustee") appointed the statutory committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code (the "Creditors' Committee").

7. On January 19, 2009, the U.S. Trustee appointed Anton R. Valukas as Examiner in the above-captioned chapter 11 cases (the "Examiner") and by order, dated January 20, 2009 [Docket No. 2583], the Court approved the U.S. Trustee's

appointment of the Examiner. The Examiner has filed his report pursuant to section 1106(b) of the Bankruptcy Code [Docket No. 7531].

8. On January 14, 2010, the Court entered the Procedures Order, which authorizes the Debtors, among other things, to file omnibus objections to no more than 500 claims at a time, on various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order.

The Amended and Superseded Claims Should Be Disallowed and Expunged

9. In reviewing the claims filed on the claims register in these cases and maintained by the Court-appointed claims agent, the Debtors have determined that each Amended and Superseded Claim on Exhibit A has been amended and superseded by the corresponding Surviving Claim that was subsequently filed by or on behalf of the same creditor.

10. A filed proof of claim is “deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). If an objection refuting at least one of the claim’s essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009); *In re Adelphia Commc’ns Corp.*, Ch. 11 Case No. 02-41729 (REG), 2007 Bankr. LEXIS 660 at *15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000).

11. Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1). Claims that are amended and superseded by subsequent claims

filed by the same creditor are routinely disallowed and expunged. *See, e.g., In re Enron Corp.*, Case No. 01 B 16034 (AJG), 2005 WL 3874285, at *1 n.1 (Bankr. S.D.N.Y. Oct. 5, 2005) (noting that “[i]n as much as the Initial Claim was amended and superseded by the Amended Claim, it was disallowed and expunged”); *In re Best Payphones, Inc.*, Case No. 01-15472, 2002 WL 31767796, at *4, 11 (Bankr. S.D.N.Y. Dec. 11, 2002) (expunging amended, duplicative claim).

12. The Debtors cannot be required to pay on the same claim more than once. *See, e.g., In re Finley, Kumble, Wagner, Heine, Underberg, Manley, Myerson, & Casey*, 160 B.R. 882, 894 (Bankr. S.D.N.Y. 1993) (“In bankruptcy, multiple recoveries for an identical injury are generally disallowed.”). Elimination of redundant claims will also enable the Debtors to maintain a claims register that more accurately reflects the proper claims existing against the Debtors.

13. Accordingly, to avoid the possibility of multiple recoveries by the same creditor, the Debtors request that the Court disallow and expunge in their entirety the Amended and Superseded Claims listed on Exhibit A.¹ The Surviving Claims will remain on the claims register subject to further objections on any basis.

Notice

14. No trustee has been appointed in these chapter 11 cases. The Debtors have served notice of this One Hundred Fifty-Seventh Omnibus Objection to Claims on (i) the U.S. Trustee; (ii) the attorneys for the Creditors’ Committee; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United

¹ Where a creditor has filed different documentation in support of the Amended and Superseded Claim and the Surviving Claim, the Debtors will treat all documentation filed with the claims as having been filed in support of the Surviving Claim.

States Attorney for the Southern District of New York; (vi) the claimants listed on Exhibit A annexed hereto; and (vii) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010, governing case management and administrative procedures for these cases [Docket No. 9635]. The Debtors submit that no other or further notice need be provided.

15. No previous request for the relief sought herein has been made by the Debtors to this or any other Court.

WHEREFORE the Debtors respectfully request that the Court grant the relief requested herein and such other and further relief as is just.

Dated: July 11, 2011
New York, New York

/s/ Robert J. Lemons
Robert J. Lemons

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Debtors
and Debtors in Possession

EXHIBIT A

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 157: EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS

CLAIMS TO BE DISALLOWED AND EXPUNGED

SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS
1	ARES ENHANCED CREDIT OPPORTUNITIES MASTER FUND, L.P. STATE STREET BANK ATTN: JONATHAN LONG 200 CLARENDON STREET, 6TH FLOOR BOSTON, MA 02116	09/21/2009	08-13555 (JMP)	21849	\$1,809,931.93	ARES ENHANCED CREDIT OPPORTUNITIES MASTER FUND LP STATE STREET BANK ATTN: JONATHAN LONG 200 CLARENDON STREET, 6TH FLOOR BOSTON, MA 02116	06/21/2011	08-13555 (JMP)	67536	\$1,809,931.93
2	CONNECTICUT DEPARTMENT OF REVENUE SERVICES C&E DIVISION, BANKRUPTCY SECTION 25 SIGOURNEY STREET HARTFORD, CT 06106- 5032	03/23/2009	08-13555 (JMP)	4511	\$425.00	CONNECTICUT DEPARTMENT OF REVENUE SERVICES C&E DIVISION, BANKRUPTCY SECTIOIN 25 SIGOURNEY STREET HARTFORD, CT 06106-5032	06/29/2011	08-13555 (JMP)	67552	\$425.00
3	CUSTOMER ASSET PROTECTION COMPANY C/O MARSH MANAGEMENT SERVICES, INC. 100 BANK STREET, SUITE 610 BURLINGTON, VT 05401	09/22/2009	08-13555 (JMP)	27993	\$3,691,456.69*	CUSTOMER ASSET PROTECTION COMPANY C/O MARSH MANAGEMENT SERVICES, INC. 100 BANK STREET, SUITE 610 BURLINGTON, VT 05401	06/15/2011	08-13555 (JMP)	67535	\$3,691,456.69*

* - Indicates claim contains unliquidated and/or undetermined amounts

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

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SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS
4	DUKE ENERGY OHIO, INC. KIAH T. FORD IV PARKER POE ADAMS & BERNSTEIN LLP 401 SOUTH TRYON STREET SUITE 3000 CHARLOTTE, NC 28202	04/07/2009	08-13555 (JMP)	3702	\$1,721,184.00	DUKE ENERGY OHIO, INC. C/O KIAH T. FORD IV PARKER POE ADAMS & BERNSTEIN LLP 401 SOUTH TRYON STREET SUITE 3000 CHARLOTTE, NC 28202	09/15/2009	08-13555 (JMP)	13122	\$1,721,184.00
5	EUROSAIL-UK 2007-4BL PLC C/O WILMINGTON TRUST SP SERVICES LONDON LIMITED FIFTH FLOOR 6 BROAD STREET PLACE LONDON, EC2M 7JH UNITED KINGDOM	09/22/2009	08-13888 (JMP)	28793	\$235,653,655.07	EUROSAIL-UK 2007-4BL PLC C/O WILMINGTON TRUST SP SERVICES (LONDON) LIMITED THIRD FLOOR 1 KING'S ARMS YARD LONDON, EC24 7AF UNITED KINGDOM	06/28/2011	08-13888 (JMP)	67551	\$235,653,655.07

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 157: EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS

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	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS
6	EUROSAIL-UK 2007-4BL PLC C/O WILMINGTON TRUST SP SERVICES LONDON LIMITED FIFTH FLOOR 6 BROAD STREET PLACE LONDON, EC2M 7JH UNITED KINGDOM	09/22/2009	08-13555 (JMP)	28794	\$235,653,655.07	EUROSAIL-UK 2007-4BL PLC C/O WILMINGTON TRUST SP SERVICES (LONDON) LIMITED THIRD FLOOR 1 KING'S ARMS YARD LONDON, EC2R 7AF UNITED KINGDOM	06/28/2011	08-13555 (JMP)	67550	\$235,653,655.07
7	GILA RIVER POWER, L.P. C/O ENTEGRA POWER GROUP LLC ATTN: JERRY COFFEY 100 S. ASHLEY DRIVE, SUITE 1400 TAMPA, FL 33602	09/22/2009	08-13885 (JMP)	27997	\$952,837.00	GILA RIVER POWER, L.P. C/O ENTEGRA POWER GROUP LLC ATTN: JERRY COFFEY 100 S. ASHLEY DRIVE, SUITE 1400 TAMPA, FL 33602	06/09/2011	08-13885 (JMP)	67523	\$952,837.00
8	GILA RIVER POWER, L.P. C/O ENTEGRA POWER GROUP LLC ATTN: JERRY COFFEY 100 S. ASHLEY DRIVE, SUITE 1400 TAMPA, FL 33602	09/22/2009	08-13555 (JMP)	27998	\$952,837.00	GILA RIVER POWER, L.P. C/O ENTEGRA POWER GROUP LLC ATTN: JERRY COFFEY 100 S. ASHLEY DRIVE, SUITE 1400 TAMPA, FL 33602	06/09/2011	08-13555 (JMP)	67522	\$952,837.00

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 157: EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS

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9	J.P. MORGAN SECURITIES LTD 125 LONDON WALL LONDON, EC2Y KAJ UNITED KINGDOM	10/27/2009	08-13555 (JMP)	49679	\$3,543.66	J.P. MORGAN SECURITIES LTD. C/O SUSAN MCNAMARA JPMORGAN CHASE BANK, N.A. MAIL CODE: NY1-A436 ONE CHASE MANHATTAN PLAZA - FLOOR 26 NEW YORK, NY 10005	06/27/2011	08-13555 (JMP)	67541	\$3,543.66
10	J.P. MORGAN SECURITIES LTD 125 LONDON WALL LONDON, EC2Y 5AJ UNITED KINGDOM	10/27/2009	08-13555 (JMP)	49680	\$2,952.57	J.P. MORGAN SECURITIES LTD. C/O SUSAN MCNAMARA JPMORGAN CHASE BANK, N.A. MAIL CODE: NY1-A436 ONE CHASE MANHATTAN PLAZA - FLOOR 26 NEW YORK, NY 10005	06/27/2011	08-13555 (JMP)	67543	\$2,952.57
11	J.P. MORGAN SECURITIES LTD 125 LONDON WALL LONDON, EC2Y 5AJ UNITED KINGDOM	10/27/2009	08-13555 (JMP)	49700	\$2,763.14	J.P. MORGAN SECURITIES LTD. C/O SUSAN MCNAMARA JPMORGAN CHASE BANK, N.A. MAIL CODE: NY1-A436 ONE CHASE MANHATTAN PLAZA - FLOOR 26 NEW YORK, NY 10005	06/27/2011	08-13555 (JMP)	67544	\$2,763.14

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 157: EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS

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SURVIVING CLAIMS

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12	J.P. MORGAN SECURITIES LTD 125 LONDON WALL LONDON, EC2Y 5AJ UNITED KINGDOM	10/27/2009	08-13555 (JMP)	49701	\$770,314.85	J.P. MORGAN SECURITIES LTD. C/O SUSAN MCNAMARA JPMORGAN CHASE BANK, N.A. MAIL CODE: NY1-A436 ONE CHASE MANHATTAN PLAZA - FLOOR 26 NEW YORK, NY 10005	06/27/2011	08-13555 (JMP)	67545	\$770,314.85
13	J.P. MORGAN SECURITIES LTD 125 LONDON WALL LONDON, EC2Y 5AJ UNITED KINGDOM	10/27/2009	08-13555 (JMP)	49702	\$3,033.76	J.P. MORGAN SECURITIES LTD. C/O SUSAN MCNAMARA JPMORGAN CHASE BANK, N.A. MAIL CODE: NY1-A436 ONE CHASE MANHATTAN PLAZA - FLOOR 26 NEW YORK, NY 10005	06/27/2011	08-13555 (JMP)	67546	\$3,033.76
14	J.P. MORGAN SECURITIES LTD 125 LONDON WALL LONDON, EC2Y 5AJ UNITED KINGDOM	10/27/2009	08-13555 (JMP)	49706	\$3,532.26	J.P. MORGAN SECURITIES LTD. C/O SUSAN MCNAMARA JPMORGAN CHASE BANK, N.A. MAIL CODE: NY1-A436 ONE CHASE MANHATTAN PLAZA - FLOOR 26 NEW YORK, NY 10005	06/27/2011	08-13555 (JMP)	67547	\$3,532.26

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 157: EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS

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15	J.P. MORGAN SECURITIES LTD. 125 LONDON WALL LONDON, EC2Y 5AJ UNITED KINGDOM	10/27/2009	08-13555 (JMP)	49779	\$1,955.56	J.P. MORGAN SECURITIES LTD. C/O SUSAN MCNAMARA JPMORGAN CHASE BANK, N.A. MAIL CODE: NY1-A436 ONE CHASE MANHATTAN PLAZA - FLOOR 26 NEW YORK, NY 10005	06/27/2011	08-13555 (JMP)	67548	\$1,955.56
16	J.P.MORGAN SECURITIES LTD 125 LONDON WALL LONDON, EC2Y 5AJ UNITED KINGDOM	10/27/2009	08-13555 (JMP)	49678	\$783,365.00	J.P. MORGAN SECURITIES LTD. C/O SUSAN MCNAMARA JPMORGAN CHASE BANK, N.A. MAIL CODE: NY1-A436 ONE CHASE MANHATTAN PLAZA - FLOOR 26 NEW YORK, NY 10005	06/27/2011	08-13555 (JMP)	67542	\$783,365.00

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

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17	LIBERTY MUTUAL INSURANCE COMPANY SASCHA BLOM, COUNSEL C/O LAW OFFICE OF JOHN KILPATRICK 1100 NORTHWEST LOOP 410 SUITE 302 SAN ANTONIO, TX 78213	09/21/2009	08-13888 (JMP)	24526	\$213,925.30	LIBERTY MUTUAL EMPLOYEES THRIFT INCENTIVE PLAN NANCY L. KEATING 175 BERKELEY STREET BOSTON, MA 02117	06/28/2011	08-13888 (JMP)	67549	\$213,925.30

OMNIBUS OBJECTION 157: EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS

* - Indicates claim contains unliquidated and/or undetermined amounts

OMNIBUS OBJECTION 157: EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS

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20	SAPHIR FINANCE PLC - SERIES 2006-8 - SERIES A C/O BANK OF NEW YORK MELLON-LONDON BRANCH, THE ATTN: SANAJAY JOBANPUTRA - VICE PRESIDENT GLOBAL CORPORATE TRUST ONE CANADA SQUARE LONDON, E14 5AL UNITED KINGDOM	09/21/2009	08-13888 (JMP)	25839	\$3,398,927.17	SAPHIR FINANCE PLC- SERIES 2006-8-SERIES A C/O THE BANK OF NEW YORK MELLON-LONDON BRANCH ATTN: SANJAY JOBANPUTRA-VICE PRESIDENT, GLOBAL CORPORATE TRUST ONE CANADA SQUARE LONDON, E14 5AL UNITED KINGDOM	06/24/2011	08-13888 (JMP)	67539	\$3,398,927.17
21	SAPHIR FINANCE PLC - SERIES 2006-8 CLASS A C/O BANK OF NEW YORK MELLON - LONDON BRANCH, THE ATTN: SANAJAY JOBANPUTRA - VICE PRESIDENT GLOBAL CORPORATE TRUST ONE CANADA SQUARE LONDON, E14 5AL UNITED KINGDOM	09/21/2009	08-13555 (JMP)	25840	\$3,398,927.17	SAPHIR FINANCE PLC- SERIES 2006-8-SERIES A C/O THE BANK OF NEW YORK MELLON-LONDON BRANCH ATTN: SANJAY JOBANPUTRA-VICE PRESIDENT, GLOBAL CORPORATE TRUST ONE CANADA SQUARE LONDON, E14 5AL UNITED KINGDOM	06/24/2011	08-13888 (JMP)	67538	\$3,398,927.17

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 157: EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS

CLAIMS TO BE DISALLOWED AND EXPUNGED

SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS
22	SAXO BANK A/S ATTN: MICHAEL V. MOLLER PHILIP HEYMANS ALLE 14 HELLERUP, 2900 DENMARK	09/18/2009	08-13555 (JMP)	20576	\$30,347,631.00	SAXO BANK A/S ATTN: THOMAS JULIAN GRAVERS PHILIP HEYMANS ALLE 14 HELLERUP, 2900 DENMARK	06/23/2011	08-13555 (JMP)	67537	\$30,347,631.00
23	SEA PORT GROUP SECURITIES, LLC TRANSFEROR: ARMORY MASTER FUND,LTD. 360 MADISON AVENUE, 22ND FLOOR NEW YORK, NY 10017	10/29/2009	08-13555 (JMP)	55527	\$5,000,000.00	SEA PORT GROUP SECURITIES, LLC TRANSFEROR: ARMORY MASTER FUND LTD. 360 MADISON AVENUE, 22ND FLOOR NEW YORK, NY 10017	06/29/2011	08-13555 (JMP)	67553	\$5,000,000.00
24	SERENGETI OPPORTUNITIES PARTNERS LP TRANSFEROR: JPMORGAN CHASE BANK, N.A. C/O SERENGETI ASSET MANAGEMENT LP ATTN: S CHOUDHURY, 632 BROADWAY, 12TH FL 632 BROADWAY, 12TH FLOOR NEW YORK, NY 10012	12/30/2008	08-13888 (JMP)	1505	\$4,800,000.00	SERENGETI OPPORTUNITIES PARTNERS LP TRANSFEROR: JPMORGAN CHASE BANK, N.A. C/O SERENGETI ASSET MANAGEMENT LP ATTN: S CHOUDHURY, 632 BROADWAY, 12TH FL 632 BROADWAY, 12TH FLOOR NEW YORK, NY 10012	01/11/2010	08-13888 (JMP)	66086	\$4,800,000.00

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 157: EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS

CLAIMS TO BE DISALLOWED AND EXPUNGED

SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS
25	TENNESSEE DEPARTMENT OF REVENUE C/O ATTORNEY GENERAL P.O. BOX 20207 NASHVILLE, TN 37202- 0207	09/15/2009	08-13885 (JMP)	12665	\$1,275.26	TENNESSEE DEPARTMENT OF REVENUE C/O ATTORNEY GENERAL P.O. BOX 20207 NASHVILLE, TN 37202-0207	06/13/2011	08-13885 (JMP)	67529	\$1,049.14
						TENNESSEE DEPARTMENT OF REVENUE C/O ATTORNEY GENERAL P.O. BOX 20207 NASHVILLE, TN 37202-0207	06/13/2011	08-13885 (JMP)	67530	\$376.72
26	THE ROYAL BANK OF SCOTLAND, PLC TRANSFEROR: ICP PENDULUM FUND I, L.P. ATTN: MATTHEW ROSENCRANS 600 WASHINGTON BLVD. STAMFORD, CT 06901	09/16/2009	08-13888 (JMP)	13823	\$1,650,000.00	THE ROYAL BANK OF SCOTLAND, PLC TRANSFEROR: ICP PENDULUM FUND I, L.P. ATTN: MATTHEW ROSENCRANS 600 WASHINGTON BLVD. STAMFORD, CT 06901	07/22/2010	08-13888 (JMP)	66952	\$1,650,000.00

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 157: EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS

CLAIMS TO BE DISALLOWED AND EXPUNGED

SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS
27	THE ROYAL BANK OF SCOTLAND, PLC TRANSFEROR: ICP PENDULUM FUND I, L.P. ATTN: MATTHEW ROSENCRANS 600 WASHINGTON BLVD. STAMFORD, CT 06901	09/16/2009	08-13555 (JMP)	13826	\$1,650,000.00	THE ROYAL BANK OF SCOTLAND, PLC TRANSFEROR: ICP PENDULUM FUND I, L.P. ATTN: MATTHEW ROSENCRANS 600 WASHINGTON BLVD. STAMFORD, CT 06901	07/22/2010	08-13555 (JMP)	66953	\$1,650,000.00
TOTAL					\$55,314,125.82					

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : **Chapter 11 Case No.**
: **LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (JMP)**
: **Debtors.** : **(Jointly Administered)**
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**ORDER GRANTING DEBTORS' ONE HUNDRED FIFTY-SEVENTH OMNIBUS
OBJECTION TO CLAIMS (AMENDED AND SUPERSEDED CLAIMS)**

Upon the one hundred fifty-seventh omnibus objection to claims, dated July 11, 2011 (the "One Hundred Fifty-Seventh Omnibus Objection to Claims"),¹ of Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court's order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664], seeking disallowance and expungement of the Amended and Superseded Claims on the basis that such claims have been amended and superseded by the corresponding Surviving Claims, all as more fully described in the One Hundred Fifty-Seventh Objection to Claims; and due and proper notice of the One Hundred Fifty-Seventh Omnibus Objection to Claims having been provided to (i) the U.S. Trustee; (ii) the attorneys for the Creditors' Committee; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York; (vi) the claimants listed on Exhibit A attached to the One Hundred Fifty-

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Debtors' One Hundred Fifty-Seventh Omnibus Objection to Claims.

Seventh Omnibus Objection to Claims; and (vii) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010, governing case management and administrative procedures for these cases [Docket No. 9635]; and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the One Hundred Fifty-Seventh Omnibus Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the One Hundred Fifty-Seventh Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the One Hundred Fifty-Seventh Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto under the heading “*Claims to be Disallowed and Expunged*” (collectively, the “Amended and Superseded Claims”) are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that the claims listed on Exhibit 1 annexed hereto under the heading “*Surviving Claims*” (collectively, the “Surviving Claims”) will remain on the claims register subject to the Debtors’ right to further object as set forth herein; and it is further

ORDERED that this Order supersedes all previous orders regarding the disposition of the Amended and Superseded Claims listed on Exhibit 1 annexed hereto; and it is further

ORDERED that all information included on and all documentation filed in support of any Amended and Superseded Claim, including, but not limited to, derivative and guarantee questionnaires and supporting documentation, shall be treated as having been filed in support of and included in the corresponding Surviving Claim; and it is further

ORDERED that nothing in this Order or the disallowance and expungement of the Amended and Superseded Claims constitutes any admission or finding with respect to any of the Surviving Claims, and the Debtors' rights to object to the Surviving Claims on any basis are preserved; *provided, however*, that notwithstanding anything herein to the contrary, the Debtors may not object to a Surviving Claim that is listed on Exhibit 1 annexed hereto to the extent that it has been allowed by order of the Court or allowed pursuant to a signed settlement or termination agreement authorized by the Court; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, (i) any claim listed on Exhibit A annexed to the One Hundred Fifty-Seventh Omnibus Objection to Claims under the heading "*Claims to be Disallowed and Expunged*" that is not listed on Exhibit 1 annexed hereto and (ii) any Surviving Claim; *provided, however*, that if the Court subsequently orders that a Surviving Claim did not appropriately amend and supersede the corresponding Amended and Superseded Claim, then the claims agent shall be authorized and directed to immediately reinstate such Amended and Superseded Claim in these chapter 11 cases

(the “Reinstated Claim”) and the rights of all interested parties with respect to the Reinstated Claim shall be expressly reserved; and it is further

ORDERED that notwithstanding any other provision of this Order, a Surviving Claim and all documentation previously filed in support of the Surviving Claim, including, but not limited to, amended derivative and guarantee questionnaires and supporting documentation, shall be deemed timely filed to the extent it appropriately amended and superseded, directly or indirectly, a claim that had been timely filed; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2011
New York, New York

UNITED STATES BANKRUPTCY JUDGE